



Mark Loevy-Reyes <mark@loevy.com>

Re: Rosario v. Waterhouse - Deposition Issues

1 message

Mark Loevy-Reyes <mark@loevy.com>

Wed, Sep 16, 2020 at 11:20 AM

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Counsel:

I write regarding two deposition issues. First, in the absence of any objection, Plaintiff scheduled the deposition of Jason Strunk with Mr. Strunk's attorney for the deposition to be held on October 5, 2020. Mr. Strunk's attorney had previously advised me that he intends to appear in person for the deposition. Plaintiff will send a subpoena and deposition notice when the logistics are arranged.

Second, Plaintiff has considered the individual Defendants' objections to appearing for depositions remotely before 90 days to determine the course of the COVID-19 situation. Plaintiff cannot agree to such a delay given that discovery in this case is scheduled to close on January 29, 2021. Plaintiff requests that Defendants provide times so that we can confer on the issue before September 25, 2020.

Thank you for your consideration.

Mark

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